

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JOHNNY M. HUNT,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 3:23-cv-00243
)	
SOUTHERN BAPTIST CONVENTION;)	Judge Campbell
GUIDEPOST SOLUTIONS LLC; and)	Magistrate Judge Frensley
EXECUTIVE COMMITTEE OF THE)	Jury Demand
SOUTHERN BAPTIST CONVENTION,)	
)	
Defendants.)	

**MOTION TO STRIKE FOR FAILURE TO COMPLY WITH LOCAL AND FEDERAL
RULES AND OPPOSITION TO MOTION TO EXPEDITE
AND FOR EMERGENCY RELIEF**

Plaintiff Johnny M. Hunt, by and through the undersigned counsel, respectfully moves this Court to deny without prejudice the Motions filed by Jane Doe¹ on April 9, 2024 (Doc. Nos. 168, 170, 172), due to Jane Doe’s failure to complete the meet and confer requirements pertaining to the same.²

As explained in the accompanying Memorandum, the Court should deny Jane Doe’s Motions (Doc. Nos. 168, 170, 172) without prejudice, and direct that counsel to complete the appropriate meet and confer efforts and report to the Court whether any issues remain for resolution. With the Court’s approval, Plaintiff will defer the discovery deadline as to Jane Doe’s

¹ For purposes of this motion, Plaintiff refers to the Complainant as Jane Doe. Plaintiff does not waive any arguments opposing the use of this or any other pseudonym.

² The instant filing, together with the accompanying Memorandum, also serves as Plaintiff’s Response in Opposition to the Motion to Expedite and for Emergency Relief filed by Jane Doe on April 9, 2024. (Doc. No. 172).

deposition. Accordingly, there is no need for an expedited ruling and counsel will have sufficient time to meet and confer on the issues raised in Jane Doe's Motions.

For the foregoing reasons, as well as the reasons set forth in the accompanying Memorandum, Plaintiff respectfully requests the Motions filed by Jane Doe on April 9, 2024 (Doc. Nos. 168, 170, 172) be denied without prejudice. Further, Plaintiff requests that the Court direct counsel to complete appropriate meet and confer efforts and report to the Court whether any issues remain for resolution.

Dated: April 10, 2024

Respectfully submitted,

s/ Andrew Goldstein

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Motion to Strike for Failure to Comply with Local and Federal Rules and Opposition to Motion to Expedite and for Emergency Relief to be electronically filed with the Clerk of the Court on April 10, 2024, using the CM/ECF system, which will automatically serve all counsel of record listed below:

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